

SHELBY COUNTY 9-1-1 DISTRICT

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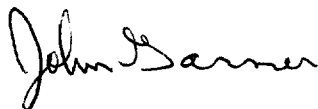
via Fed Ex

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Caton:

Please find enclosed an original and ten copies of our comments on Docket No. 94-102. If you have any questions, please feel free to call at any time.

Sincerely,



John Garner
Director

JG/pae

Enclosures

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Before the
Federal Communications Commission
Washington, D. C. 20554

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In the Matter of)
) CC docket No. 94-102
Revision of the Commission's rules)
to ensure compatibility with) RM-8143
enhanced 911 emergency calling systems)

Comments of the
Emergency Communications District
of Shelby County, Tennessee
(Shelby County 9-1-1 District)

The Emergency Communications District of Shelby County, Tennessee (Shelby County 9-1-1) is very encouraged by the Commission's proposal to ensure compatibility with 9-1-1 systems. Incompatibility of PBX systems and wireless communications systems with 9-1-1 systems is one of the greatest challenges facing 9-1-1 operations today. In general, we support the position stated in the PCIA, APCO, NENA, and NASNA Emergency Access Position Paper. We have, however, several areas of concern with the rules as proposed in Docket No. 94-102. Our comments are addressed to specific paragraphs in the docket.

PBX Compatibility

Paragraph 6: Contrary to the statement in this paragraph and others in the proposed rules enhanced 9-1-1 systems do not route calls to the "closest PSAP" but rather to the appropriate PSAP. The closest PSAP may not have jurisdiction over the location from which a call is placed. This is especially true in urban areas. We suggest replacing the word "closest" with the word "appropriate".

Paragraph 12: We are concerned whether the language "PBX and other dispersed private telephone systems" includes "Centrex", "ESSX" or

"shared tenant services". It is essential that these services be compatible with 9-1-1 services. We suggest language similar to that found in Mississippi Code 1972 Annotated, tit. 29 Chapter 5 (referenced in the proposed rules) which defines these terms and requires that entities supplying these services ensure their compatibility with 9-1-1 services.

Paragraph 16: Although GTE has stated "... there are particular difficulties identifying the location of calls placed from college campuses, hospitals ..." these problems can and have been overcome. The University of Tennessee at Knoxville campus currently provides accurate ANI and ALI to the Knox County PSAP.

Paragraph 21: We suggest that physically small locations should be exempt from the proposed rules only where it can be demonstrated that emergency service providers would have little or no difficulty locating the calling party upon arrival on the scene of an emergency.

Paragraph 22: We suggest that a caller who dials either 9-1-1, 9-9-1-1 or X-9-1-1 (where X is the digit required to reach an outside line) must be able to access 9-1-1 services with ANI and ALI available to the PSAP operator. We also suggest that this not be limited to PBX stations having the capability to reach the public switched network, but rather be available at all PBX stations. This is extremely important from a public education standpoint. The individual experiencing a real or perceived emergency may not be familiar with the particular PBX system. He or she may be familiar with the system, but due to the immediate crisis may dial as if he or she were at home or dial "9" for the outside access when some other digit is required. The point is that the person in the crisis must not have to think about it before dialing.

Paragraph 23: We agree that PBX equipment should be "capable" of providing attendant notification. Attendant "bridge-on" should only be activated if this is acceptable to the local 9-1-1 and emergency service authorities. We suggest that wherever an attendant is present notification of ANI and ALI data via display or printer should be available if desired by the PBX equipment owners and operators.

Paragraph 24: We suggest that "timely and accurate database maintenance" is an absolute requirement of enhanced 9-1-1 service. If this is not made part of the final rules, then the entire process will have been an expensive exercise in futility. We cannot emphasize this enough.

Paragraph 27: We agree that NENA standards for information protocol should be explicitly referenced in the final rules. These standards have been developed and are being updated in a cooperative relationship with all major entities involved in the manufacture, distribution and use of PBX and 9-1-1 equipment. This has occurred in much the same manner as digital radio standards are being developed and accepted by the Commission.

Paragraph 31: We agree with the time frame of one year from effective date of the rules after which manufacture and importation of incompatible equipment must cease. We also agree with the eighteen month period after which newly installed equipment must also be compatible. We disagree, however, with the lack of a requirement to upgrade existing PBX equipment to be compatible with 9-1-1 service. This would leave too many individuals who may experience an emergency without proper access to emergency assistance for too long a period of time. We suggest that owners and operators of existing, incompatible PBX equipment be granted an additional five years beyond the one year period to replace or upgrade their equipment in order to assure universal compatibility.

Wireless Compatibility

Paragraph 49: The three step process to achieve wireless compatibility with 9-1-1 services is unacceptable if 9-1-1 or other emergency agencies would be required to acquire, replace, modify or update 9-1-1 network or customer premise equipment to receive ANI and ALI data at more than one point in the process.

The language "PSAP closest to the mobile caller" is unacceptable. This PSAP may not have jurisdiction over the location from which the call was placed. 9-1-1 calls from wireless users must be routed to the PSAP responsible for the location from which the call was placed. This must be closely coordinated by the wireless service provider and the local 9-1-1 authority. This is currently

the practice of both cellular providers in Memphis, Tennessee. Each of these providers routes 9-1-1 calls to the PSAP responsible for the area served by the cell site or antenna receiving the call. These cellular providers serve all of western Tennessee and much of northern Mississippi and eastern Arkansas. The "first step" described in the proposed rules is not a sufficient improvement in the current situation to warrant increased costs to the wireless provider or to the 9-1-1 authority. We suggest that this "first step" be deleted.

Paragraph 50: The "second stage" appears to require PSAP personnel to use the information presented by the wireless provider to locate the caller on a map. This also does not improve on the current situation. We suggest that this second step be deleted.

Paragraph 51: The "third phase" calls for location identification to within 125 meters. This is much too large an area. This may encompass several multi-story buildings or multiple city blocks. The expense of implementing ANI and ALI data delivery from wireless callers is too great to settle for this little accuracy. We suggest that the final rules require accuracy much greater than 125 meters. The degree of accuracy should be such that emergency service providers arriving at the location described by the ALI data will have little or no difficulty locating the caller.

The time frame discussed in the proposed rules is too long. We suggest eliminating steps one and two and requiring step three to be implemented within three years of the effective date of the rules.

Paragraph 55: We suggest that technologies employed to transmit ANI and ALI data to the PSAP must be uniform nationally. The format and content of ANI and ALI data must also be uniform nationally. Wireless device users are likely to travel throughout the nation for business and personal reasons. They will want to use their wireless communications devices wherever they go. They must be assured that in the event of an emergency, 9-1-1 can be accessed properly regardless of where they are.